



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

FEB 07 2013

Mr. Glen Schwartz
Mile Rail, LLC
8116 Wilson Road
Kansas City, Missouri 64125

RE: Comments on the Revised PCB Characterization Work Plan Addendum Dated January 30, 2013 for the Former GST Steel Facility Site

Dear Mr. Schwartz:

The United States Environmental Protection Agency has reviewed the subject document and is providing approval of the submittal with the following conditions.

1. The concrete pad that is presumed/estimated to be covering the vault shall have concrete chip samples collected from the upper surface prior to removal from the top of the vault. Based on the known history of the site, the surface of the concrete pad is the area that would most likely be contaminated from PCBs. If the samples of the concrete pad were collected after its removal, the area most likely contaminated may not get sampled. Should these sampling results indicate PCB-contamination greater than 1 part per million, the extent of surface contamination on the concrete pad will need to be characterized with additional sampling prior to excavation.
2. The EPA would like to clarify; the number of aliquots will affect the regulatory definitions for PCB contamination levels allowed per 40 CFR 761.61.
3. Aliquots for composite samples collected to characterize the fill material may not be combined from non-contiguous areas. The plan proposes to combine aliquots from the North and Southeast Areas into one composite sample. This proposal is not being approved. The North and Southeast areas shall be analyzed as independent composite samples. This will result in four total composite samples to characterize the fill material.
4. Aliquots collected from the soil inside the vault area shall be collected as close to the concrete walls as practical.

I can be reached at (913) 551-7755, if you have any questions concerning these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Morrison".

Bruce Morrison
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Mark L. Finney, Shaw Environmental, Incorporated



Printed on Recycled Paper